## REMARKS

The Office Action dated October 27, 2008 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1, 3-5, 7-12, 14-22, and 24-31, and 33 are now pending in this application. Claims 1, 3-5, 7-12, 14-22, and 24-31 stand rejected.

The rejection of Claims 1, 3-5, 7-12, 14-22, 24-31, and 33 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement is respectfully traversed.

As is well established, the test of enablement is whether one reasonably skilled in the art could make or use the invention from the disclosure in the patent coupled with information known in the art without undue experimentation. United States v. Telectronics, Inc., 857 F.2d 778, 785, 8 USPQ2d 1217, 1223 (Fed. Cir. 1988). Applicants respectfully submit that the Section 112 rejection of Claims 1, 3-5, 7-12, 14-22, 24-31, and 33 is not a proper rejection. More specifically, Applicants respectfully submit that Applicants' specification satisfies the requirements of Section 112, first paragraph, and that the disclosure, including the figures, enables one of ordinary skill in the art to make and use the invention. The Federal Circuit has opined in Verve LLC v. Crane Cams, Inc., 65 USPQ 2d 1051, 1053-1054 (Fed. Cir. 2002), that "[p]atent documents are written for persons familiar with the relevant field; the patentee is not required to include in the specification information readily understood by practitioners, lest every patent be written as a comprehensive tutorial and treatise for the generalist, instead of a concise statement for persons in the field."

In the present application, Applicants respectfully submit that one of ordinary skill in the art would understand the present invention, including the recitation of obtaining commands specific to at least one appliance from a device information table, after reading the specification, in view of the figures. In contrast to the assertion on pages 2-3 of the Office Action that the disclosure is not enabled for "a device information table", Applicants respectfully submit that a

device information table and the implementation of such a table is described in sufficient detail such that one skilled in the art, upon reading the specification in light of the figures, would be enabled to make and use Applicants' invention. Applicants respectfully submit that Applicants' specification satisfy the requirements of Section 112, first paragraph. Accordingly, Applicants request withdrawal of the Section 112, first paragraph, rejection.

The rejection of Claims 1, 3-5, 7-12, 14-22, 24-31, and 33 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,875,430 to Koether (hereinafter referred to as "Koether") in view of U.S. Patent 4,580,276 to Andruzzi, Jr., et al. (hereinafter referred to as "Andruzzi") is respectfully traversed.

Koether describes a bi-directional communication system (100) that provides real-time computer-aided diagnostics, asset history, accounting records, maintenance records, and energy management to ensure proper work allocation of administrative and repair tasks in the food service industry. The system (100) includes a control center (170), a plurality of kitchen base stations (150) connected to the control center (170), and a plurality of kitchen or cooking appliances (110) connected to a base station (150) located within a corresponding site or cell (105). Maintenance and/or repair, once initialized, are monitored through the control center (170), which includes a database (190) with software diagnostics, accounting records, inventory records, and maintenance records for the particular appliance (110) under service. Notably, Koether does not describe or suggest a diagnostic interface that is integrally coupled within one of a plurality of appliances and programmed with diagnostic software such that only authorized access is permitted to at least one superuser-level function of an appliance.

Andruzzi describes an amplitude-shift keying/frequency-shift keying (ASK/FSK) data encoding and transmission scheme. In a particular embodiment, Andruzzi describes the transmission scheme functioning along the lines of a common power-line carrier system. Data is exchanged in a bidirectional fashion (half-duplex) within a localized transmission medium

defined by the electrical distribution system (metallic conductors) of a building, house, or any localized residential/commercial complex.

Claim 1 recites a method of performing service diagnostics on appliances. The method includes "initiating a diagnostic interface that is integrally coupled within one of a plurality of appliances, each of the plurality of appliances in direct communication with the diagnostic interface via a power line carrier; accessing at least one appliance of the plurality of appliances; performing a service diagnosis of the at least one appliance through the diagnostic interface over the power line carrier using commands specific to the at least one appliance, the commands specific to the at least one appliance obtained from a device information table; implementing the diagnostic interface within a single device including a display, processing circuitry programmed with diagnostic software such that only authorized access is permitted to at least one superuser-level function and generating service commands to perform the service diagnosis, a power line carrier modem configured to modulate data to communicate the data over the power line carrier, and a serial communication bus coupling the diagnostic interface to the power line carrier modem; and servicing, by the diagnostic interface, the at least one appliance via the power line carrier, said servicing comprising at least one of adjusting a characteristic of the at least one appliance and displaying to a technician the service diagnosis."

No combination of Koether and Andruzzi describes or suggests a method of performing service diagnostics on appliances, as recited in Claim 1. More specifically, no combination of Koether and Andruzzi describes or suggests a method of performing service diagnostics on appliances that includes initiating a diagnostic interface that is integrally coupled within one of a plurality of appliances, and implementing the diagnostic interface within a single device including processing circuitry programmed with diagnostic software such that only authorized access is permitted to at least one superuser-level function and generating service commands to perform the service diagnosis.

Rather, Koether describes an interface including multiple devices. More specifically, decisions are made by a microprocessor within a kitchen base station in accordance with data received from a control center over a data network. The kitchen base station is not a single diagnostic interface device integrally coupled within one of the appliances nor does it include a display. Andruzzi merely describes a transmission scheme wherein data is exchanged in a bidirectional fashion (half-duplex) within a localized transmission medium.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Koether in view of Andruzzi.

Claims 3-5, 7-11, 30, and 31 depend from independent Claim 1. When the recitations of Claims 3-5, 7-11, 30, and 31 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 3-5, 7-11, 30, and 31 likewise are patentable over Koether in view of Andruzzi.

Claim 12 recites a diagnostic interface for performing service diagnostics on appliances. The diagnostic interface includes "a display for viewing diagnostic and service information; processing circuitry programmed with diagnostic software such that only authorized access is permitted to at least one superuser-level function and for generating service commands for an appliance; and a serial communication bus coupling said processing circuitry to a power line carrier communication interface configured to be directly connected to a plurality of appliances, wherein said power line carrier communication interface facilitates transmitting the service commands to the plurality of appliances and receiving appliance diagnostic results on a power line carrier communication system, and said diagnostic interface implemented within a single device including said display and integrally coupled within one of the plurality of appliances, said processing circuitry generating the service commands to service at least one appliance of said plurality of appliances, the service commands being specific to the at least one appliance and obtained by said processing circuitry from a device information table, and said power line communication interface configured to modulate data to communicate the data over an

alternating current (AC) power line, wherein said diagnostic interface configured to service the at least one appliance via said power line carrier communication interface by at least one of adjusting a characteristic of at least one appliance and displaying to a technician the appliance diagnostic results."

No combination of Koether and Andruzzi describes or suggests a diagnostic interface, as recited in Claim 12. More specifically, no combination of Koether and Andruzzi describes or suggests a diagnostic interface that includes processing circuitry programmed with diagnostic software such that only authorized access is permitted to at least one superuser-level function and that generates service commands to service an appliance, wherein the service commands are specific to the appliance and are obtained by the processing circuitry from a device information table. Moreover, no combination of Koether and Andruzzi describes or suggests a diagnostic interface that is implemented within a single device including a display, the processing circuitry, and a power line communication interface all integrally coupled within one of the plurality of appliances.

Rather, Koether describes an interface including multiple devices. More specifically, decisions are made by a microprocessor within a kitchen base station in accordance with data received from a control center over a data network. The kitchen base station is not a single diagnostic interface device integrally coupled within one of the appliances nor does it include a display. Andruzzi merely describes a transmission scheme wherein data is exchanged in a bidirectional fashion (half-duplex) within a localized transmission medium.

Accordingly, for at least the reasons set forth above, Claim 12 is submitted to be patentable over Koether in view of Andruzzi.

Claims 14-21 depend from independent Claim 12. When the recitations of Claims 14-21 are considered in combination with the recitations of Claim 12, Applicants submit that dependent Claims 14-21 likewise are patentable over Koether in view of Andruzzi.

Claim 22 recites a diagnostic system for providing access to service diagnostics on an appliance. The diagnostic system includes "a plurality of appliances; a diagnostic interface integrally coupled within one of said plurality of appliances and configured to be directly connected to said plurality of appliances, said diagnostic interface comprising a display, wherein said diagnostic interface facilitates accepting service diagnostics commands destined for at least one appliance of said plurality of appliances, the service diagnostics commands specific to said at least one appliance and obtained by said diagnostic interface from a device information table, said diagnostic interface implemented within a single device including a display device, a microprocessor programmed to permit only authorized access to at least one superuser-level function and to generate the service diagnostics commands, and a serial communication bus configured to couple said microprocessor to a power line carrier modem, said power line carrier modem configured to modulate data to communicate the data over an alternating current (AC) power line, wherein said diagnostic interface configured to service said plurality of appliances via said power line carrier modem by at least one of adjusting a characteristic of at least one appliance and displaying to a technician the diagnostics commands; and a dedicated appliance controller for receiving and executing the service diagnostics commands."

No combination of Koether and Andruzzi describes or suggests a diagnostic system for providing access to service diagnostics on an appliance, as recited in Claim 22. More specifically, no combination of Koether and Andruzzi describes or suggests a diagnostic interface integrally coupled within one of the plurality of appliances. Moreover, no combination of Koether and Andruzzi describes or suggests a diagnostic interface including a display device, a microprocessor programmed to permit only authorized access to at least one superuser-level function and to generate the diagnostics commands, and a serial communication bus configured to couple the microprocessor to a power line carrier modem.

Rather, Koether describes an interface including multiple devices. More specifically, decisions are made by a microprocessor within a kitchen base station in accordance with data received from a control center over a data network. The kitchen base station is not a single

diagnostic interface device integrally coupled within one of the appliances nor does it include a display. Andruzzi merely describes a transmission scheme wherein data is exchanged in a bidirectional fashion (half-duplex) within a localized transmission medium.

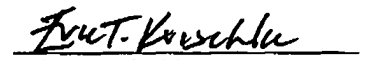
Accordingly, for at least the reasons set forth above, Claim 22 is submitted to be patentable over Koether in view of Andruzzi.

Claims 24-29, and 33 depend from independent Claim 22. When the recitations of Claims 24-29, and 33 are considered in combination with the recitations of Claim 22, Applicants submit that dependent Claims 24-29, and 33 likewise are patentable over Koether in view of Andruzzi.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1, 3-5, 7-12, 14-22, 24-31, and 33 be withdrawn.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action are respectfully solicited.

Respectfully submitted,



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